

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Eboni M. Armour-Fraley Case No. 19-28445 Chapter 13

All Cases: Moving Creditor _____ Consumer Portfolio Services, Inc. _____ Date Case Filed 10/07/2019

Nature of Relief Sought: Lift Stay Annul Stay Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed 1/9/2020

Chapter 7: No-Asset Report Filed on _____
 No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral

 - Home
 - Car Year, Make, and Model 2015 Chrysler 200
 - Other (describe) _____

2. Balance Owed as of Petition Date \$ 18,370.50
 Total of all other Liens against Collateral \$ 18,370.50

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 10,400.00

5. Default

 - Pre-Petition Default
 Number of months _____ Amount \$ 2,541.06
 - Post-Petition Default
 - On direct payments to the moving creditor
 Number of months 3 Amount \$ 2,729.91
 - On payments to the Standing Chapter 13 Trustee
 Number of months _____ Amount \$ _____

6. Other Allegations

 - Lack of Adequate Protection § 362(d)(1)
 - No insurance
 - Taxes unpaid Amount \$ _____
 - Rapidly depreciating asset
 - Other (describe) _____
 - No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - Other “Cause” § 362(d)(1)
 - Bad Faith (describe) _____
 - Multiple Filings
 - Other (describe) _____
 - Debtor’s Statement of Intention regarding the Collateral
 - Reaffirm
 - Redeem
 - Surrender
 - No Statement of Intention Filed

Date: 1/24/2020 _____ David J. Turciano
Counsel for Movant

(Rev. 12/21/09)